

REPORT OF THE INTERAGENCY COUNCIL ON ENVIRONMENTAL LEAD

MARCH 15, 2004

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Council Membership:

Patricia A. Nolan, MD, MPH – Department of Health
Terrence Gray – Department of Environmental Management
Susan Bodington – Housing Resources Commission
Sharon Kernan – Department of Human Services
Nancy Remington – R.I. League of Cities and Towns/City of East Providence
Joe Gaeta – Department of Attorney General

Invited: Paula Pallozzi – Department of Business Regulations

I. Incidence rates of lead poisoning by city and town

The incidence rate or proportion of Rhode Island children ages 0 to 72 months of age with an elevated blood lead level (10 µg/dL or greater) for the first time continues its declining trend. For calendar year 2003, the incidence rate¹ is 3.7%, an important decrease from 4.8% in 2002. The incidence rate for each city and town is included in Appendix 1.

II. Education Programs

A. A detailed update on the status of lead education objectives included in the implementation plan for the Lead Hazard Mitigation Act is attached in Appendix # 1 of this report.

B. Lead Hazard Mitigation Act educational efforts, in summary:

Educational materials. The Housing Resources Commission and the RI Department of Health, with significant participation from the RI Lead Collaborative (formed by statewide lead education partners) has been working since September 2003 to prepare educational brochures to educate homeowners, tenants and the general public about their rights and responsibilities under the new law. The materials are currently in the final phase of review and will be available before July 2004.

Lead Awareness campaign. The Housing Resources Commission, the Department of Health and the Governor's Office are currently developing a media

¹ The incidence rate is calculated by counting screened children only once and using the highest blood lead test, either capillary or venous.

campaign to educate property owners and tenants about the Lead Hazard Mitigation Act. This event is planned for Spring 2004.

Three-hour Lead Hazard Awareness Seminar. Property owners are required to attend an HRC approved 3-hour Lead Hazard Awareness Seminar. The purposes of the training are: 1) educate property owners about the causes of childhood lead poisoning; 2) evaluate and identify lead hazards in the units and premises; 3) mitigate lead hazards using lead safe practices; 4) teach property owners proper cleaning techniques; and 5) prepare mitigated units for clearance inspection. Given that there are 163,268 renter-occupied units in the state that may require compliance, HRC will make the training readily available throughout the state. Beginning in March 2004, HRC will work with the following agencies to offer the 3-hour Lead Hazard Awareness Seminar: Community College of RI, Childhood Lead Action Project, Housing Network, RI Realtors Association, and Lead Safe Centers. Once these agencies are trained HRC will begin to recruit additional training providers to offer the course.

C. Lead Centers

In early 2003, three additional lead centers were certified by the Center for Child and Family Health at DHS. Certified Comprehensive Lead Centers provide a comprehensive package of services to lead poisoned children and their families, including non-medical case management, education, advocacy, window replacement and spot repair, referrals, support and assistance with housing. A total of 184 "significantly lead poisoned children²" were referred to the lead centers for case management services and were offered an environmental inspection by the Department of Health.

Lead Centers received a total of 450 referrals from the Department of Health in 2003. In addition to the 184 referrals above cited, there were 266 referrals for children with a single test indicating a blood-lead level of 15 to 19 micrograms per deciliter of blood. The Department of Health is unable to provide environmental lead inspections for these families.

Additionally, 11 representatives from the four lead centers and two state agencies (the Department of Health and DHS) attended the 40-hour Inspector Training class during the summer of 2003. Six of the attendees have since become licensed Inspector Technicians. This effort was sponsored by the Department of Human Services.

Additional resources: www.dhs.ri.gov.

III. Regulations Adopted Pursuant to R.I. Gen Laws §§ 23-24.6 and 42-128.1 and Other Implementation Activities

- A. In January 2003, the National Center for Healthy Housing was hired to assist the Housing Resources Commission (HRC) to develop a four year Comprehensive

² "Significantly lead poisoning" is defined as one confirmed blood lead level greater than or equal to 20 µg/dL in a child under six years of age. Alternatively, two samples from a child under six years of age, separated by at least 90 days but no more than 365 days, with a blood lead level greater than or equal to 15 µg/dL.

Strategic Plan to reduce the incidence of childhood lead poisoning by 2007. The Plan established goals for reducing the incidence of childhood lead poisoning and increasing the supply of housing where lead hazards are mitigated. The Comprehensive Strategic Plan was adopted at the HRC's June 2003 quarterly meeting.

- B. The Rules and Regulations for Lead Poisoning Prevention are being amended to address changes in definitions and enforcement requirements. In addition, the terms "Lead Hazard Reduction", "Lead Hazard Control", and "Lead Hazard Mitigation" are being clarified to avoid confusion with regulations adopted by the Housing Resources Commission. Proposed amendments will be presented to the Interagency Coordinating Council on Environmental Lead in March; with subsequent community partners review in April, and public hearing in June 2004.
- C. The Lead Hazard Mitigation Act, R.I. Gen. Laws § 42-128.1-9, requires that the Department of Business Regulation set policy and issue any regulations necessary to implement the portions of this Act relating to insurance coverage for lead poisoning. The DBR initiated a series of meetings with legislators, trial lawyers, insurers and other state agencies to discuss the issues and solicit input. The Department promulgated a proposed regulation and held a public hearing on December 31, 2002, and received written comments from over twenty interested parties. Insurance Regulation 101 became effective April 8, 2003.

The purpose of the DBR's regulation is to establish a uniform policy regarding lead poisoning coverage in pre-1978 residential rental property liability coverage and to set forth requirements to assure the availability of insurance coverage for losses and damages caused by lead poisoning. In accordance with Insurance Regulation 101, insurers and advisory organizations were required to submit proposed policy forms and rate filings for lead liability coverage to the Department by October 1, 2003. The Department, along with its consulting actuaries, is in the process of reviewing the proposed filings for compliance with the Lead Hazard Mitigation Act and is currently addressing with the filers clarifications necessary for the filings to be in compliance with the Act. The Department continues to handle insurance related complaints to ascertain insurers' compliance with the Lead Hazard Mitigation Act, the Unfair Claims Settlement Practices Act and Insurance Regulation 101. In addition to promulgating Insurance Regulation 101, the Department issued Insurance Bulletins #2003-9 and #2003-13 to address issues that arose out of consumer complaints and miscellaneous inquiries relating to the insurers' issuance of lead liability coverage in Rhode Island. Lastly, the Department continues to work with the Department of Health, the Housing Resources Commission, and the Environmental Lead Interagency Coordinating Council to address insurance related issues as they arise.

- D. In March 2003, the Housing Resources Commission adopted the Lead Hazard Mitigation Regulations. These regulations established mitigation standards and acceptable lead hazard control measures property owners must adhere to in order to comply with these regulations.

E. City and Town Programs

Rhode Island Cities and Towns have used a variety of funding resources to address lead based paint hazards in residential housing units primarily occupied by low and moderate income families. The major contributions come from the U.S. Department of Housing and Urban Development through the Lead-Based Paint Hazard Control and Healthy Homes Programs, the Community Development Block Grant Program (Entitlement Cities and Small Cities Programs; HOME Program), municipal bonding and private investment. Five Rhode Island Cities operated a lead hazard reduction program in 2003. The State of Rhode Island, Office of Municipal Affairs receives an annual allocation of HUD CDBG Small Cities funds that are distributed competitively to towns in the State. Year 2003 highlights include:

- a) **Providence**: Total funding: \$8,800,000; Housing units made lead safe: 578
Pawtucket³: Total funding: \$ 1,300,000; Housing units made lead safe: 23
East Providence⁴: Total funding: \$ 1,530,922; Housing units made lead safe: 10
Woonsocket⁵: Total funding: \$ 598,000; Housing units made lead safe: 11
Warwick: Total funding: \$ 1,887,814; Housing units made lead safe: None yet
State of R.I. I (33 towns): \$ 3,239,533; Housing units rehabbed, including lead hazard control: 372
- b) Lead poisoning prevention educational activities are provided to parents and children at local Head Start facilities, kindergarten and elementary schools and day care centers, including home-based day care centers.
- c) 76 persons have received lead training certificates, including lead workers, lead supervisors and inspector technicians, through Providence's program.

- E. The Housing Resources Commission contracted with Rhode Island Housing and Mortgage Finance Corporation to implement and administer the Lead Hazard Reduction Program. This program makes funds available to property owners whose homes have lead paint and are identified as health risks for occupancy. Funds are made available to homeowners and rental property owners to reduce the risk of lead poisoning for children under age of six, children with elevated blood lead levels (EBL) and those units cited by the Department of Health. Also targeted are home-based daycare units and low-income children living in Section

³ Some cities and towns had few units made lead safe during the reporting period primarily due to staffing challenges, limited number of bidding contractors, delays between contract award and scheduled work, and long application process.

⁴ Same as above.

⁵ Same as above.

8 subsidized units. Projects sponsored by non-profit organizations also receive priority. In addition to direct support, this program provides a one-time \$2,000 loan reduction to owners who opted to take the education incentive. This helps owners lower their loan balance and also ensure that the property will be maintained in a lead safe manner.

In 2003, \$1,787,868 million were committed to complete 199 units. Since 1999, the State Lead Hazard Reduction Program has committed over \$9.5 million representing 306 loans toward making 1,083 units lead-safe. Seventy percent (70%) of the program's loans are made to core urban cities such as Providence, Pawtucket, Newport, Woonsocket and Central Falls where the incidence of lead poisoning is highest. The average median income of the borrowers is \$34,000.

Overall, the State Lead Hazard Reduction Program is making a significant impact on improving the condition of residential property throughout the state of Rhode Island. In addition, the program is helping to increase public awareness of the hazards of lead-based paint and how to eliminate it.

G. Compliance and enforcement

Housing Resources Commission:

The Act required HRC and Department of Health to develop a data system to track compliance with the Lead Hazard Mitigation Act and the Childhood Lead Prevention Act. The Comprehensive Strategic Plan suggested a web-based data system may be the most efficient way to track compliance and is accessible to all interested parties.

HRC continues to work with RI.Gov to create a web-based data system to track lead hazard mitigation compliance and certificates issued by licensed Lead Inspectors/Lead Inspector Technicians. RI.gov anticipates the data system will be available to the Lead Inspectors and the public by July 1, 2004. This web-based data system will allow the public and third parties access to information on rental dwelling units that have certificates of conformance, lead safe, and lead free certificates issued by HRC or Department of Health.

Department of the Attorney General:

In 2003, the Department of the Attorney General received 28 new referrals from the Department of Health for prosecution under the Lead Poisoning Prevention Act, 10 of which resulted from inspections performed in 2003 and the remaining 18 were the result of inspections prior to 2003. Of these 28 new referrals:

- 5 cases have been closed (complete lead-safe status achieved)
- 10 cases remain in civil litigation (most requiring exterior and/or soil remediation only)
- 1 signed Consent Agreement (full abatement due 7/30/04)

- 6 cases are pending exterior and/or soil remediation only
- 6 cases have achieved no significant progress toward abatement

In total, the Department of the Attorney General closed 26 existing DOH-referred lead poisoning prevention cases in 2003. Presently, of the 276 total DOH-referred cases since the 1990's, 151 cases remain open in various stages of prosecution by the Department of the Attorney General.

Department of Health:

In 2003, the Department of Health offered comprehensive environmental lead inspections to the families of 184 significantly lead-poisoned children. 115 inspections were performed; while in 31% of the cases (58 families) inspections were not performed because the service was not accepted, the child moved out of state or there was no response to letters and phone calls. The following table provides details on the status of these inspections⁶.

	1998	1999	2000	2001	2002	2003
Inspections Offered	487	324	262	328	264	184
Inspection Not Performed ⁷	154	72	54	103	75	58
Awaiting Inspection Results	0	0	0	0	0	11
Inspections Performed	333	252	208	225	189	115
No lead hazards found during inspection	9	4	4	8	4	2
No Longer Regulated ⁸	5	5	1	2	1	0
The parent is the owner of the property so the case is closed after 90 days	34	35	25	49	46	5
Lead hazards completely abated	183	132	122	123	81	20
Abatement is complete excluding soil remediation. ⁹	48	39	19	1	0	0
Other	5	0	0	0	0	0
Cases Closed	284	215	171	183	132	27
Abatement is complete excluding soil remediation	2	2	3	5	0	0
Exterior has been abated, the interior is pending	0	0	2	0	1	0
Interior has been abated, the exterior is pending	6	5	5	4	4	2
Enrolled or enrolling in a HUD program, awaiting abatement	5	2	2	3	3	0
Various Stages of Abatement	36	28	25	30	49	86
Ongoing Cases	49	37	37	42	57	88
Cases referred for prosecution to the Housing Court or the Department of Attorney General ¹⁰ .	56	47	31	32	23	10

⁶ Data from the Department of Health as of 2/20/2004

⁷ Inspections may not be performed due to the following conditions: a) child moved out of state; b) no response to letters and phone calls, or c) inspection refused.

⁸ Examples of properties no longer regulated include: a) an illegal apartment in a property has been dismantled, b) the property is razed, c) the property has been converted to commercial use.

⁹ Cases opened after August 1, 2001 continue to be open if soil remediation is required. Cases inspected before this date may appear open because they have been referred for prosecution.

¹⁰ Ongoing cases that have been referred for prosecution at a Housing Court or the Department of Attorney General. Please note that cases closed excluding soil remediation that have been referred will also appear in this row.

As mandated in RI General Law 23-24.6-23, the Department of Health is planning to make available the following reports as of April 1, 2004:

1. **Not Lead Safe Property List.** The Department of Health has retained the Providence Plan to identify Providence properties by their correct plat/lot. This work is now complete and has allowed the Department of Health to better track properties in Providence that may match the requirements of this list. Analysis of the Providence Plan data is now underway, and ways to identify properties outside of Providence are being discussed.
A web development project is currently underway to develop a site that will allow public access via a web search form to this list. The list will also be available for download as a single file that can be loaded into a spreadsheet or database of the users choice. The format of this file will be present with the download. This list will be updated as needed.
2. **Second Notice of Violation (2NOV) Database.** The Second Notice of Violation (2NOV) database has been developed and will be accessible by the public via a web search form as well as by an alphabetic hyperlinked index. It will also be available for download as a single "csv" file that can be loaded into a spreadsheet or database of the users choice. The format of this file will be present with the download. This database will be updated on a weekly basis, unless it is determined that the frequency needs alteration.
3. **High Risk Premises and Dwelling List.** The Department of Health is taking necessary steps to track potential properties and those properties that currently meet the standards presented by SECTION 23-24.6-23. Due to the legal deadlines associated with this section, a high risk premise will not appear on this list until the owner fails to comply with the following:
 - The owner fails to provide within 30 days a comprehensive environmental inspection showing that lead hazards have been corrected to the lead safe standard, or providing a compliance schedule to be approved by the Department of Health,
 - The owner fails to correct the identified lead hazards within 120 days of initial notice.This list will be updated weekly and will be available on the same website that holds the other lists presented here.

Rhode Island Department of Environmental Management:

In 2003, DEM received 153 complaints concerning the improper removal of lead-based paint from the exterior of buildings. In response, the Department conducted 136 initial inspections, which addressed 151 of those complaints, and found 58 violations. The Department issued 58 informal enforcement actions, consisting of Letters of Non-Compliance and warning letters, to cite and correct these problems.

The remainder of the problems was addressed quickly and appropriately by the contractors working on the sites without the issuance of any written action. Inspectors conducted 66 re-inspections to verify compliance and confirmed that 40 sites that needed exterior clean up had been properly addressed.

In addition, DEM initiated development of an Exterior Lead Paint Removal Contractor Certification Program with the goal of increasing contractor compliance with rules and regulations. Partnering with the U. S. Environmental Protection Agency (US EPA), Rhode Island Department of Health, Rhode Island Housing and Mortgage Finance Corporation, and the University of Rhode Island's Center for Pollution Prevention and Environmental Health, DEM's Office of Technical and Customer Assistance is developing this program for professional painting contractors. This new, innovative approach to regulation is being designed to achieve improved environmental protection at less cost for both business and government. To participate in the program, contractors will biannually self-certify to compliance with environmental regulations and standards.

This will make it easier for painting contractors to understand and comply with applicable DEM regulations, and EPA's Pre-Renovation Education Rule. Participation in the program is voluntary, but it will offer participants an easy-to-understand Certification Workbook, and technical assistance to help them comply with pertinent regulations and standards. Although not part of program certification, the workbook will provide information about OSHA health and safety standards and regulations that apply to lead paint removal, and reference to technical assistance available from the Department of Health's OSHA Consultative Services Program to help comply with OSHA requirements.

To date, DEM staff has produced a program Fact Sheet, a draft brochure, a Certification Participation Form & Checklist. These materials have been reviewed by the Exterior Lead Paint Steering Committee and are being revised as a result of comments. Development and implementation will continue through 2004.

Additional information: <http://www.state.ri.us/dem/>

IV. GOALS FOR 2004

Year 2004 will be of particular importance to the successful implementation of the Lead Hazard Mitigation Act. State agencies expect to continue to work in implementation of all aspects of the law so that this process, starting July 1, 2004 runs as smoothly and effectively as possible. In anticipation of the coming year, state agencies plan to work on the following efforts:

- Lead Hazard Reduction Programs will continue to do lead removal work in eligible housing units.
- Provide more comprehensive services, including coordination with building inspection departments and municipal and housing courts.

- Expand the number of qualified lead hazard control contractors and renovators/remodelers through job training programs.
- Provide educational outreach and public awareness to residents in all cities and towns.
- Continue to review policy forms and rates to assure compliance with the Lead Hazard Mitigation Act.
- Continue to investigate complaints against insurers for alleged violations of the Lead Hazard Mitigation Act, the Unfair Claims Settlement Practices Act, Insurance Regulation 101 and Insurance Bulletins #2003-9 and #2003-13.
- State agencies expect to continue to work to implement and monitor the various aspects of the Lead Hazard Mitigation Act and the comprehensive strategic plan.
- Providing more comprehensive services, including coordination with building inspection departments, municipal and housing courts and local job training programs, to expand the number of qualified lead hazard control contractors.
- Full rollout of DEM's "Exterior Lead Paint Removal Certification Program" for painting contractors.
- Design and implement the initial strategic plan to eliminate Childhood Lead Poisoning Elimination by 2010.
- Coordination between the Attorney General's office and the Department of Health for the timely prosecution as mandated by law.
- Ongoing monitoring and support for the state's four certified lead centers

APPENDIX # 1:
INCIDENCE OF LEAD POISONING IN 2003
Data from the RI Department of Health, Childhood Lead Poisoning Prevention Program

INCIDENCE RATE

Proportion of children with a BLL $\geq 10 \mu\text{g/dL}$ among screened children 0-72 months never having an elevated BLL

City/Town	2001			2002			2003		
	# Children with BLL $\geq 10 \mu\text{g/dL}$ for the First Time	Total # Children Screened with No Previous EBL	Incidence	# Children with BLL $\geq 10 \mu\text{g/dL}$ for the First Time	Total # Children Screened with No Previous EBL	Incidence	# Children with BLL $\geq 10 \mu\text{g/dL}$ for the First Time	Total # Children Screened with No Previous EBL	Incidence
BARRINGTON	13	668	1.9%	17	704	2.4%	6	644	0.9%
BRISTOL	25	676	3.7%	25	662	3.8%	17	627	2.7%
BURRILLVILLE	15	362	4.1%	19	390	4.9%	22	396	5.6%
CENTRAL FALLS	88	951	9.3%	97	1,010	9.6%	59	992	5.9%
CHARLESTOWN	8	222	3.6%	7	254	2.8%	5	221	2.3%
COVENTRY	21	906	2.3%	13	859	1.5%	14	860	1.6%
CRANSTON	69	1,883	3.7%	69	1,919	3.6%	34	1,831	1.9%
CUMBERLAND	24	871	2.8%	11	913	1.2%	11	847	1.3%
EAST GREENWICH	10	341	2.9%	7	331	2.1%	7	344	2.0%
EAST PROVIDENCE	74	1,438	5.1%	45	1,431	3.1%	42	1,410	3.0%
EXETER	5	146	3.4%	2	149	1.3%	1	139	0.7%
FOSTER	7	120	5.8%	0	103	0.0%	8	102	7.8%
GLOCESTER	8	170	4.7%	6	160	3.8%	5	152	3.3%
HOPKINTON	7	267	2.6%	7	270	2.6%	5	231	2.2%
JAMESTOWN	4	113	3.5%	2	118	1.7%	4	123	3.3%
JOHNSTON	23	685	3.4%	18	677	2.7%	18	659	2.7%
LINCOLN	20	492	4.1%	8	511	1.6%	1	480	0.2%
LITTLE COMPTON	4	106	3.8%	4	110	3.6%	4	128	3.1%
MIDDLETOWN	13	458	2.8%	20	436	4.6%	10	547	1.8%
NARRAGANSETT	8	333	2.4%	9	356	2.5%	5	262	1.9%
NEW SHOREHAM	2	27	7.4%	1	10	10.0%	1	23	4.3%
NEWPORT	85	804	10.6%	65	804	8.1%	52	845	6.2%
NORTH KINGSTOWN	27	872	3.1%	15	859	1.7%	12	816	1.5%
NORTH PROVIDENCE	17	626	2.7%	14	667	2.1%	15	604	2.5%
NORTH SMITHFIELD	7	243	2.9%	3	225	1.3%	4	220	1.8%
PAWTUCKET	160	2,610	6.1%	144	2,559	5.6%	123	2,666	4.6%
PORTSMOUTH	17	536	3.2%	15	518	2.9%	6	554	1.1%
PROVIDENCE	761	7,401	10.3%	618	7,144	8.7%	473	7,628	6.2%
RICHMOND	8	247	3.2%	8	241	3.3%	3	172	1.7%
SCITUATE	6	287	2.1%	1	300	0.3%	5	271	1.8%
SMITHFIELD	7	402	1.7%	2	399	0.5%	4	369	1.1%
SOUTH KINGSTOWN	32	836	3.8%	41	814	5.0%	15	729	2.1%
TIVERTON	27	487	5.5%	22	514	4.3%	16	472	3.4%
UNKNOWN	0	0	0.0%	0	0	0.0%	0	4	0.0%
WARREN	12	349	3.4%	10	363	2.8%	18	368	4.9%
WARWICK	45	2,032	2.2%	41	1,965	2.1%	17	1,790	0.9%
WEST GREENWICH	2	138	1.4%	3	147	2.0%	2	141	1.4%
WEST WARWICK	34	847	4.0%	26	869	3.0%	19	800	2.4%
WESTERLY	19	431	4.4%	33	656	5.0%	21	620	3.4%
WOONSOCKET	143	1,557	9.2%	87	1,640	5.3%	77	1,578	4.9%
STATEWIDE	1,857	31,940	5.8%	1,535	32,057	4.8%	1,161	31,665	3.7%

A child may be represented in this table more than once in a given year if he/she lived and was tested in more than one city or town in that year.
Source: RI Department of Health, Childhood Lead Poisoning Prevention Program.

APPENDIX # 2:
UPDATE OF LEAD EDUCATION EFFORTS FROM THE STRATEGIC PLAN

STRATEGIC PLAN

PLAN ELEMENT 1 - LEAD EDUCATION: UPDATE

GOAL	OBJECTIVE	RESPONSIBLE PARTY	STATUS OF ACTIVITIES	PROJECTED TARGET FY04
Creating and disseminating material outlining the rights and responsibilities of parties affected by the Act, to comply with 42-128.1-6	<p>Create and develop a distribution plan (including posting on web site) for the following culturally and linguistically appropriate Fact Sheets:</p> <ol style="list-style-type: none"> 1) Rights and responsibilities of parties affected by the Act; 2) Tenants' Rights and Responsibilities; 3) Mitigation Standard versus lead-safe standard; 4) Lead hazard reduction programs and resources available. 	HRC	Separate materials for property owners and tenants are in development by HRC and DOH, to be ready for distribution by 4/15/04. These comprehensive materials will be available in English and Spanish, and will include an insert on Lead Hazard Reduction Resources. An extensive distribution plan is in development.	100,000 Fact Sheets distributed
	Establish a statewide network of lead educators to work on evaluation of methods of outreach recommended in the Plan.	CLAP	The RI Lead Collaborative, coordinated by CLAP, continues to meet biweekly for purposes of evaluation of Plan Element 1 objectives.	N/A
	Sponsor a series of public service announcements on radio, television and print media to include the purposes and responsibilities set forth in the Act (to comply with 42-128.1-6).	HRC Critical partners: Governor's Office, DOH	Planning for the PSAs/Media campaign is underway by HRC, DOH and the Governor's Office and is expected to roll out in April, to coincide with the 3-hour course.	N/A
Informing property owners of their rights and responsibilities	Develop a plan for information dissemination to owners at time of real estate transaction.	RI Realtors Association	HRC is working with the insurance industry, RI Realtors Association and the League of Cities and Towns to develop strategies to meet this need.	2000 owners reached
	Include a segment on property owners' responsibilities under the Act in post-purchase classes on in-home repair and how to be a landlord.	Housing Network Member Agencies	HRC has contacted the Housing Network about this need.	10,000 owners reached

	Provide information and/or training to Section 8 owners on their rights and responsibilities under the Act and assistance with inspections.	PHAs	RIH will initiate training for Section 8 owners under RIH in April (and will probably use the 3-hour class). PHAs are likely to provide information on the Act to Section 8 owners as a result of the insurance requirements.	3,000 owners reached
	All entities providing first-time homebuyer classes should include at least a 30-minute educational segment about lead poisoning and requirements of the Act.	RIH, Housing Network	RIH and the Housing Network already include a segment on lead in their First Time Homebuyer classes. HRC will ensure inclusion of correct information on the Act.	10,000 owners reached
	Work with Realtors Association to incorporate lead education as part of their continuing education classes.	RI Realtors Association	The RI Realtors Association is working with DBR to incorporate the 3 hour lead seminar as part of their continuing education classes.	3,000 participants reached
	Develop a training plan for real estate brokers and salespersons to educate them about the requirements of the Act, to comply with 42-128.6-3.	DBR	HRC will forward DBR a copy of the 3-hour course curriculum for final approval for use in classes for real estate brokers and salespersons.	N/A
Informing Tenants of Their Rights and Responsibilities	Staff the toll-free hotline to provide counseling information services to tenants and affected parties (to comply with 42-128.1-6).	HRC (Critical partner: RILS)	A toll-free number for the Hotline has been designated.	N/A
	Update the Landlord/Tenant Handbook to include a specific section on lead.	HRC	HRC is in the process of updating the Handbook, and will include the same text as the fact sheets for property owners and tenants.	N/A
	The Energy Office should include information on lead poisoning prevention and lead hazard reduction strategies and resources to clients of:	Energy Office	DOH is currently working with the REACH program at the Energy office (reaching 800 families over 3 years) to provide home visits specifically about	26,500 Energy Office clients reached

	1) Weatherization program 2) Heating assistance program.		lead poisoning prevention, with the attempt to provide lead hazard reduction as well. DOH will coordinate with the Weatherization and Heating Assistance Programs to ensure that they make the fact sheets available to their clients during home visits.	
Training Property Owners and Construction Trades in Lead Safe Work Practices	With regard to the 3-hour course (required for all pre-1978 rental property owners or owner agents): <ul style="list-style-type: none"> - Complete the course content; - Complete the course training manual; - Forward course to professional training facilities, associations and community organizations with a training capacity; - Recruit and train a sufficient number of course trainers; - Develop a plan for wide-scale announcement of availability of the course; - Establish and maintain capacity to meet consumer demand for course offerings; - Evaluate and revise the course, as needed. 	HRC Critical partners: RI Realtors Association, RI Builders Association, PHAs, Housing Network, CLAP	The 3-hour course content and course manual have been completed and have been reviewed by HRC's Office of Program Performance and Evaluation. Agencies and staff interested in becoming "3-hour course trainers" have been identified, and formal training will be carried out on 3/10/04. Trainers will be individually certified, and agencies can be recognized as course "providers". The first course is expected to roll out in April 2004. Announcement of course availability will be part of the PSAs/media campaign.	1,000 owners or owner agents completing 3 hour training
	With regard to the 8-hour lead-safe renovator/remodeler course, DOH should: <ol style="list-style-type: none"> 1) Certify additional course trainers; 2) Establish and maintain capacity to meet consumer demand for course offerings; 3) Explore partnerships for sponsoring training; 4) Develop a plan to encourage 	DOH Critical partners: RIH CCRI RIBA	DOH is performing an expedited review for approval of a new lead-safe renovator/remodeler course, and is encouraging Masimax, an out-of-state 8-hour course training provider, to become certified in RI. In order to ensure capacity, DOH will assess consumer demand and maintain communication with	600 owners or owner agents completing 8-hour lead-safe remodeler training

	property owners to take the 8-hour course.		certified training providers. In addition, DOH continues to encourage property owners to take the 8-hour course through ongoing regulatory contact.	
	Encourage all registered contractors to take the 8-hour course.	HRC	RIH will have all of their construction specialists trained as Lead Inspector-Technicians. In addition, HRC is working with DEM to encourage contractors to take the 8-hour course as part of DEM's self-certification process (in development).	200 contractors completing 8-hour course
	Provide information about lead hazard mitigation requirements at retail hardware and paint stores and home-improvement centers (to comply with 42-128.1-6, including signs that contain the required language).	HRC	DOH will provide stocks of fact sheets about the Act to all RI hardware and paint stores and home improvement centers, to be made available to customers. HRC is working with DOH to design and produce the signs required to be displayed in hardware and paint stores (with language required by the Act).	22 stores displaying sign
Engaging local building officials	Encourage all local building official field staff to complete 8-hour Lead Safe Remodeler/Renovator course.	Building Code Commission	HRC and building officials are coordinating trainings for all RI building officials.	N/A (no action expected in FY04)
Increasing Insurers' familiarity with implementation of the Act	Sponsor seminars and/or other information options to enable industry personnel to become more familiar with the provisions and requirements of the Act.	DBR Critical partner: FAIR Plan	HRC is coordinating with the Governor's Insurance Council to address this need.	50 Insurer attendees
	Encourage all insurance companies insuring residential homes to include a lead awareness informational packet in the renewal mailing to clients or with other correspondence,	DBR	DOH will provide insurance companies stocks of fact sheets to mail and make available to their clients.	200,000 clients reached with informationa

	at least once a year.			1 packet
Primary prevention through education	All OB/GYN providers should provide lead poisoning prevention information to all pregnant clients early in pregnancy.	DOH	DOH is preparing a strategy to have all RI OB/GYNs include lead information in info packets given to pregnant women early in pregnancy.	50 OB/GYN practices disseminating information
	Distribute information to tenants on preventive measures: cleaning, diet, hand washing, etc.	DOH	This is being done DOH, CLAP, and other agencies on an ongoing basis through presentations, materials distribution, etc.	N/A
	All maternity hospitals in the state should provide lead poisoning prevention information to pregnant women early in pregnancy and soon after birth.	DOH	DOH is seeking approval from all RI maternity hospitals to include lead information in packets given to mothers with newborns in-hospital.	5 maternity hospitals disseminating information
	Ask the Department of Education to require school departments to send lead education information including the fact sheets about the Act and Tenants' Rights, to parents of pre-k through grade 12 students once a year.	DOE	Fact sheets for property owners and tenants will be made available to the Department of Education.	N/A
	Encourage DCYF to include at least at 30-minute training on lead poisoning prevention as a requisite for certification/licensure of Home-Based Day Care Providers.	DCYF	The RI Lead Collaborative is working with DCYF to include lead education as a requisite for certification of home-based day care providers. The RI Lead Collaborative will ensure that this education includes correct information about the Act.	N/A (no action expected in FY04)
Evaluating Lead Education and Outreach Efforts	Evaluate all methods of outreach recommended in Plan Element 1; use evaluation findings to modify, redesign, or otherwise recommend new strategies to be developed.	RI Lead Collaborative	The RI Lead Collaborative continues to meet biweekly for purposes of evaluation of Plan Element 1 objectives.	N/A